

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

A.H.Z.,

Plaintiff,

v.

KRISTI NOEM, *et al.*,<sup>1</sup>

Defendants.

Case No. 2:24-cv-01983-JHC

STIPULATED MOTION TO HOLD  
CASE IN ABEYANCE AND ORDER

Noted for Consideration:  
January 27, 2025

Plaintiff and Defendants, by and through their counsel of record, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, hereby jointly stipulate and move to stay these proceedings until August 15, 2025. Plaintiff brought this litigation pursuant to the Administrative Procedure Act and Mandamus Act seeking, *inter alia*, to compel U.S. Citizenship and Immigration Services (“USCIS”) to schedule an interview and adjudicate his asylum application. Defendants’ response to the Complaint is currently due on February 4, 2025. The

<sup>1</sup> Pursuant to Federal Rule of Civil Procedure 25(d), Defendants substitute Department of Homeland Security Kristi Noem for Alejandro Mayorkas and U.S. Citizenship and Immigration Services (“USCIS”) Acting Director Jennifer B. Higgins for Ur M. Jaddou.

1 parties are currently working towards a resolution to this litigation. For good cause, the parties  
2 request that the Court hold the case in abeyance until August 15, 2025.

3 Courts have “broad discretion” to stay proceedings. *Clinton v. Jones*, 520 U.S. 681, 706  
4 (1997). “[T]he power to stay proceedings is incidental to the power inherent in every court to  
5 control the disposition of the causes on its docket with economy of time and effort for itself, for  
6 counsel, and for litigants.” *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936); *see also* Fed. R. Civ.  
7 P. 1.

8 With additional time, this case may be resolved without the need of further judicial  
9 intervention. USCIS has scheduled Plaintiff’s asylum interview for April 17, 2025. USCIS  
10 agrees to diligently work towards completing the adjudication within 120 days of the interview,  
11 absent unforeseen or exceptional circumstances that would require additional time for  
12 adjudication. If the adjudication is not completed within that time, USCIS will provide a status  
13 report to the Court. Plaintiff will submit all supplemental documents and evidence, if any, to  
14 USCIS seven to ten days prior to the interview date. Plaintiff recognizes that failure to submit  
15 documents prior to the interview may require the interview to be rescheduled and the  
16 adjudication delayed. If needed, Plaintiff will bring an interpreter to the interview, otherwise the  
17 interview will need to be rescheduled and the adjudication delayed. Once the application is  
18 adjudicated, Plaintiff will dismiss the case with each party to bear their own litigation costs and  
19 attorneys’ fees. Accordingly, the parties request this abeyance to allow USCIS to conduct  
20 Plaintiff’s asylum interview and then process his asylum application.

21 As additional time is necessary for this to occur, the parties request that the Court hold  
22 the case in abeyance until August 15, 2025. The parties will submit a status update on or before  
23 August 15, 2025.

24 //

1 DATED this 27th day of January, 2025.

2 Respectfully submitted,

3 TESSA M. GORMAN  
United States Attorney

O'SULLIVAN LAW OFFICE

4 s/ Michelle R. Lambert

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*Attorney for Plaintiff*

10 *Attorneys for Defendants*

11 *I certify that this memorandum contains 395*  
12 *words, in compliance with the Local Civil Rules.*

**ORDER**

The case is held in abeyance until August 15, 2025. The parties shall submit a status update on or before August 15, 2025. It is so **ORDERED**.

DATED this 27th day of January, 2025.

  
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JOHN H. CHUN  
United States District Judge